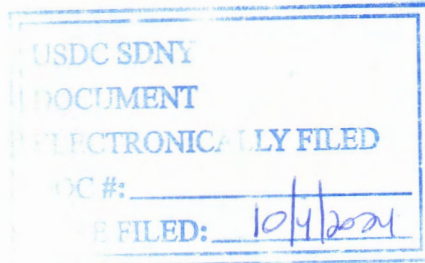


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October 3, 2024

VIA ECF

The Hon. Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street, Room 2550
New York, New York 10007

Re: **Shaffer v. Faidinkum Consulting, LLC et al**
Docket No.: 1:24-cv-06067-CM
First Extension Request
Letter Motion for Extension to Respond to First Amended Complaint

Dear Judge McMahon,

We represent Defendants Faidinkum Consulting, LLC ("Consulting"), Faidinkum Management Holdings, LLC ("Holdings"), David Hafke, and Michael Lianos ("Individual Defendants") in this matter. We respectfully request an extension of time to file a response to the First Amended Complaint in this matter to November 17, 2024.

The current deadline for the Individual Defendants to answer or otherwise respond is November 1, 2024.¹ The response deadline for Consulting and Holdings is October 10, 2024. For consistency, Defendants respectfully request that the deadline be reset to November 17, 2024, which will also afford Defendants the necessary time to investigate the allegations and prepare their response to the First Amended Complaint.

Plaintiff's counsel agreed to an extension to October 21, 2024. No previous requests for extensions or adjournments have been made. The initial case conference is scheduled for November 7, 2024.

¹ The Summons and First Amended Complaint was left with an employee at the individual defendants' place of business. Under CPLR 308(2), service at an individual's place of business "shall be complete ten days after" filing of the proof of service. Here, Plaintiff filed the proofs of service for the individual defendants on October 1, 2024; making service complete on October 11, 2024, and the individual defendants' response to the First Amended Complaint due on November 1, 2024.

We thank the Court for its time and consideration in this matter.

Respectfully submitted,

GORDON & REES

/s/ Michael S. Hanan

Michael S. Hanan
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cc: All counsel of record (via ECF)